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Judge Timothy W. Dore
CHAPTER 13
Exparte

6
7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9

10 **THOMPSON, Erin Elizabeth,**

11 Debtor.

Number 22-11903

12 **THOMPSON, Erin Elizabeth,**

13 Plaintiff,

Adversary Number: 22-01066

14 v.

**EXPARTE MOTION &
DECLARATION FOR ORDER
DISMISSING MAXIMUS EDUCATION
LLC**

15 **UNITED STATES OF AMERICA
16 ACTING THROUGH THE U.S.
17 DEPARTMENT OF EDUCATION et al**

18 Defendant.

19 COMES NOW, Erin Elizabeth Thompson, Plaintiff herein, and moves the Court for an
20 Order dismissing Maximus Education LLC as defendant in this adversary proceeding.

21 This motion is based upon the Declaration of Plaintiff's counsel, Travis A. Gagnier.

22 Dated this 11th day of July 2023.

23 Law Offices of Travis Gagnier, Inc., P.S.
24 Attorneys for Plaintiff

25 /s/ Travis A. Gagnier
26 Travis A. Gagnier, WSBA #26379
27 Gregory Jalbert, WSBA #9480
28 Of Counsel

DECLARATION IN SUPPORT OF ORDER OF DISMISSAL

Travis A. Gagnier, under penalty of perjury, hereby declares as follows:

1. I am counsel of record for the Plaintiff herein.
2. I have personal knowledge of the following facts and competent to testify regarding the same.
3. My office filed this adversary proceeding on behalf of the Plaintiff.
4. Subsequently I have been provided information from Maximus Education LLC that it does not own any of student loans involving Plaintiff but is merely a servicing agent for the US Department of Education. Based upon that information I believe it is proper to dismiss Maximus Education LLC as a defendant in this adversary proceeding.

WHEREFORE, your Declarant prays for the entry of an Order of dismissing defendant Maximus Education LLC.

Dated this 11th day of July 2023.

/s/ Travis A. Gagnier
Travis A. Gagnier, WSBA #26379

Presented by:
Law Offices of Travis Gagnier, Inc., P.S.
Attorneys for Plaintiff

/s/ Travis A. Gagnier
Travis A. Gagnier, WSBA #26379
Gregory Jalbert, WSBA #9480
Of Counsel